

JOSEPH B. SALA, Ph.D.

1 they had been present requires you to speculate,  
2 correct?

3 A. No.

4 Q. You did not know Glen Coggins?

5 A. I did not.

6 Q. You've never interviewed him,  
7 obviously?

8 A. No.

9 Q. You've never spoken to his family  
10 members?

11 A. No.

12 Q. You've never spoken to a single person  
13 alive that knows Glen Coggins, correct?

14 A. Correct.

15 Q. You don't know his cognitive  
16 abilities?

17 A. I do not.

18 Q. But you can give testimony under oath  
19 saying how or what he would do. Is that your  
20 testimony?

21 A. Based on the evidence available and  
22 the scientific understanding of human information  
23 processing, behavioral response to warnings, yes,  
24 I can make a determination as to -- to a

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Exhibit 15